

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: SHAMAR DAVID : CHAPTER 13
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:
DEBTOR : Bankruptcy No. 17-17538

MOTION TO ABATE PAYMENTS AND MODIFY PLAN POST-CONFIRMATION

SHAMAR DAVID, through her attorney, Zachary Perlick, Esquire, hereby moves for an Amendment of his Chapter 13 Plan Post-Confirmation, and sets forth in support thereof the following:

1. Debtor filed a voluntary Chapter 13 Petition on April 19, 2016; the Chapter 13 plan was confirmed on November 6, 2017.

2. Debtor lost income and fell behind in her payments to the trustee and mortgage as a result of COVID-19.

3. PennyMac Loan Services filed a Motion for Relief on March 31, 2020. The Motion was settled and the parties agreed to enter into a stipulation. The stipulation requires the debtor to pay the arrears through her Chapter 13 Plan.

4. Debtor wishes to modify her confirmed plan in order to be consistent with the repayment terms to this secured creditor.

5. Debtor will cure the post-petition amounts due to the Trustee over the remainder of the plan as called for in the modified plan which is being filed concurrently with this motion.

6. Debtor's confirmed plan required payments of \$918.00 each month for the remaining months of the plan. Debtor's

modified Chapter 13 plan requires payments of \$925.10 for 41 months.

7. Debtor's modified plan extends the plan to 72 months. Debtor seeks additional time to complete the plan pursuant to the CARES Act.

Wherefore, Debtor requests that her Motion to Abate Plan Payments and Motion to Amend Plan Post-Confirmation be Granted.

Respectfully submitted,

/Zachary Perlick/
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